UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

| LORNA WASHINGTON | | | | | | | * | | | | | |
|------------------------|---|---|---|---|---|---|---|------|----------|--|---|--|
| Plaintiff | | | | | | | * | | | | | |
| v. | | | | | | | * | Civi | I Actior | | | |
| WASHINGTON MUTUAL BANK | | | | | | | * | | | | | |
| Defendants | | | | | | | * | | | | | |
| * | * | * | * | * | * | * | • | | . | | 4 | |

NOTICE OF REMOVAL

Defendant Washington Mutual Bank, incorrectly sued as Wash Mutual ("Defendant"), by its attorneys and pursuant to 28 U.S.C. §§ 1331 and 1441, et seq., files this Notice of Removal and as grounds for removal states:

- 1. Plaintiff Loma Washington ("Plaintiff"), filed suit against Defendant in the District Court of Maryland for Frederick County, on or about December 19, 2006.
- 2. Defendant received a copy of the Summons and Complaint filed by Plaintiff on or about January 2, 3007.
- 3. Plaintiff's Complaint alleges violation of the federal Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq., and federal Fair Debt Collection Act, 15 U.S.C. § 1692, et seq., and seeks damages in the amount of \$5,000.00.
- 4. This action is subject to removal pursuant to 28 U.S.C. §§ 1331 and 1441(b) at the request of Defendant because Plaintiff's claims arise under the law of the United States.
- 5. Defendant has filed this Notice of Removal within 30 days after receiving a copy of the Summons and Complaint in this action.
- 6. Attached to this notice are copies of all papers served on Defendant in the state court action.

DMEAST #9699298 v1

Respectfully submitted,

Robert A. Scott (#24613)
Ballard Spahr Andrews & Ingersoll, LLP
300 E. Lombard Street
18th Floor
Baltimore, MD 21202
(410) 528-5600

Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of January, 2007, a copy of the foregoing Notice of Removal was mailed by first class mail, postage prepaid to:

Lorna Washington, *pro se* 6960 Exeter Court Apartment 105 Frederick, Maryland 21703

Robert A. Scott